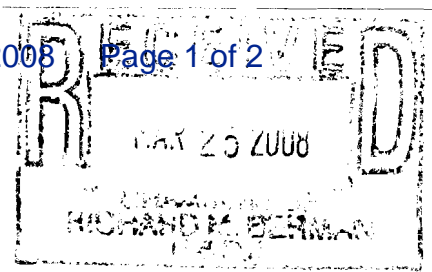
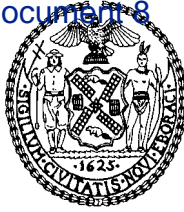


MEMO ENDORSED
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MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

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STUART E. JACOBS
phone: (212) 788-0899
fax: (212) 788-9776
email: sjacobs@law.nyc.gov

March 25, 2008

BY HAND

Honorable Richard M. Berman
United States District Court Judge
Southern District of New York
500 Pearl Street, Room 650
New York, New York 10007

Re: Brown v. City of New York et al., 07 CV 6163 (RMB)

Dear District Judge Berman:


I am the Assistant Corporation Counsel in the Office of Michael A. Cardozo, Corporation Counsel of the City of New York, assigned to the above-referenced case. I write on behalf of defendant City of New York (1) to respectfully request that the Court extend the deadline for the close of discovery by forty-five (45) days, from March 26, 2008, to May 12, 2008 and (2) the Court adjourn the conference currently scheduled for March 28, 2008 at 9:00 a.m. to a date after May 12, 2008. This is the second request for an extension of the discovery deadline, and is made with the consent of plaintiff's counsel, Kristen Finlon, Esq.

To date, the parties have been engaged in document discovery. Additionally, the parties have been involved in settlement negotiations.¹ To that end, the parties met in person recently at the Office of the Corporation Counsel in order to explore settlement, and are amicably working towards an expeditious resolution of this matter. The extension of discovery will allow the parties to further explore settlement, prior to expending the resources of conducting further discovery. If the parties are unable to resolve the case through settlement, the enlargement of time will permit the parties to complete the outstanding discovery in this action.

For the reasons set forth above, the parties request that (1) the deadline to complete discovery be extended from March 26, 2008, to May 12, 2008 and (2) the Court adjourn the conference currently scheduled for March 28, 2008 at 9:00 a.m. to a date after May 12, 2008.

¹ Plaintiff is currently incarcerated at Orleans Correctional Facility in Albion, New York, and therefore communication with plaintiff has been delayed.

Respectfully submitted,


Stuart Jacobs (SJ 8379)
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **BY FAX (212) 509-8088**
Kristen Finlon, Esq.
Beranbaum Menken Ben-Asher & Bierman LLP
80 Pine Street, 32nd Floor
New York, New York 10005

<p>Discovery extension granted + settlement conference with principals adjourned to 5/15/08 @ 9:30 A.M. Parties to negotiate in good faith in advance.</p> <hr/> <p>SO ORDERED: Date: <u>3/25/08</u> <u>Richard M. Berman</u> Richard M. Berman, U.S.D.J.</p>
